



U.S. Department  
of Transportation  
**National Highway  
Traffic Safety  
Administration**

APR - 2 2018

1200 New Jersey Avenue SE  
Washington, DC 20590

**Via Certified Mail and Email (delivery receipt requested)**

Mr. Todd Fronckowiak  
Assistant Director, Global Automotive  
Safety Compliance  
Ford Motor Company  
Fairlane Plaza South, Ste. #500  
330 Town Center Drive  
Dearborn, MI 48126-2738

NEF-107aa  
AQ18-001  
17V-408

**Re: Audit of Safety Recall Campaign, Rental of Recalled Vehicles, Zipcar, Inc.**

Dear Mr. Fronckowiak:

NHTSA received information suggesting that a rental company, Zipcar, Inc. (Zipcar) rented at least one model year (MY) 2015 Ford Transit vehicle to a customer without having had all required safety recall repairs performed on that vehicle. Specifically, the information suggests repairs required under safety recall number 17V-408 were not made prior to the rental. This recall concerns certain model year 2015 through 2017 Ford Transit vehicles equipped with a flexible driveshaft coupling that may prematurely fail. A failed driveshaft coupling may prevent the vehicle from moving under its own power, increasing the risk of a crash.

A rental company's sale, lease, or rental of a motor vehicle with a safety recall outstanding is a serious matter and a violation of Federal law to which significant civil penalties could apply. See 49 U.S.C. §§ 30120(i) and 30165. This office has opened an audit query (AQ) investigation and is sending this information request in order to determine whether Zipcar (defined below) has complied with the prohibition of renting unremedied vehicles subject to safety recalls.

For reference, a copy of the redacted complaint we received is enclosed.



## DEFINITIONS

Unless otherwise stated in the text, the following definitions and instructions apply to these information requests:

1. "Ford" means Ford Motor Company, including all of its divisions, subsidiaries and affiliated enterprises and its employees, and all agents, contractors, consultants, attorneys and law firms and other persons engaged directly or indirectly (e.g., employee of a consultant) by or under the control of Ford (including all business units and persons previously referred to).
2. The term "you" or "your" refers to Ford.
3. "Zipcar" means Zipcar, Inc., including all of its divisions, affiliated enterprises (including but not limited to PV Holding Corporation) and its employees, and all agents, contractors, consultants, attorneys and law firms and other persons engaged directly or indirectly (e.g., employee of a consultant) by or under the control of Zipcar (including all business units and persons previously referred to).
4. The term "communications" is used in the broadest sense of the word and shall mean the exchange, transfer, or relay of any ideas, messages, or information by speech, writing, or other means, whether electronic, paper, or in person.
5. The term "person" includes natural persons, proprietorships, partnerships, firms, corporations, federal, state, and local governments, all departments and agencies thereof, and any other governmental agencies, political subdivisions, groups, associations, or organizations, whether located in the United States or abroad.
6. The term "relate to" or "relating to" means constituting, comprising, containing, setting forth, showing, disclosing, describing, explaining, summarizing, concerning, or referring to, directly or indirectly.
7. The term "explain," "describe in detail," or "state in detail" mean the following:
  - a. Describe fully by reference to underlying facts rather than ultimate facts or conclusions of law or fact.
  - b. Particularize as to:
    - i. The identity of each person involved in each such event, including but not limited to persons employed Ford and those persons purporting to act for Ford;
    - ii. The specific acts of each person participating in each such event;
    - iii. The date and time of each such event;
    - iv. The address and location of each such event; and
    - v. The identity of each person present during each such event.

8. The term "Document(s)" is used in the broadest sense of the word and shall mean all original written, printed, typed, recorded, or graphic matter whatsoever, however produced or reproduced, of every kind, nature, and description, and all non-identical copies of both sides thereof, including, but not limited to, papers, letters, memoranda, correspondence, communications, electronic mail (e-mail) messages (existing in hard copy and/or in electronic storage), and faxes. For purposes of this request, any document that contains any note, comment, addition, deletion, insertion, annotation, or otherwise comprises a non-identical copy of another document shall be treated as a separate document subject to production.
9. "Safety recall 17V-408" means the safety recall Ford is conducting through its dealerships to remedy certain model year 2015 through 2017 Ford Transit vehicles equipped with a flexible driveshaft coupling that may prematurely fail. A failed driveshaft coupling may prevent the vehicle from moving under its own power, increasing the risk of a crash.
10. "Recall notice" refers to any action in which Ford notifies its owners and purchasers, pursuant to 49 CFR § 577, of a safety recall.
11. Other Terms: To the extent that they are used in this information request, the terms "claim," "consumer complaint," "dealer field report," "field report," "fire," "fleet," "good will," "make," "model," "model year," "notice," "property damage," "property damage claim," "rollover," "type," "warranty," "warranty adjustment," and "warranty claim," whether used in singular or plural form, have the same meaning as found in 49 CFR 579.4.
12. The singular includes the plural; the plural includes the singular. The masculine gender includes the feminine and neutral genders; and the neutral gender includes the masculine and feminine genders. "And" as well as "or" shall be construed either disjunctively or conjunctively, to bring within the scope of this information request all responses that might otherwise be construed to be outside its scope. "Each" shall be construed to include "every" and "every" shall be construed to include "each." "Any" shall be construed to include "all" and "all" shall be construed to include "any." The use of a verb in any tense shall be construed as the use of the verb is a past or present tense, whenever necessary to bring within the scope of the document request all responses which might otherwise be construed to be outside its scope.

## INFORMATION REQUESTS

1. Identify any and all notices or communications Ford transmitted or otherwise made available to Zipcar (including, but not limited to, notifications, service bulletins, recall notices, reports, and letters, whether paper or electronic (such as through any Ford interactive network)) concerning safety recall 17V-408. For each notice or communication you identify, state: (a) the date Ford transmitted it or otherwise made it available to Zipcar; (b) the type of the notice or communication (e.g., recall notice, repair bulletin, etc.); (c) the means of transmission (e.g., U.S. Mail, email, Ford interactive Network, fax, etc.); and (d) the number and/or VINs of affected units Ford identified as within Zipcar's possession, if any.

Produce a copy of each notice or communication you identify in response to this question, including copies of any accompanying enclosures or attachments.

2. Identify any other communications, other than those already identified and produced in your response to Information Request No. 1, between Ford and Zipcar concerning safety recall 17V-408. For each such communication, state: (a) the date Ford transmitted it or otherwise made it available to Zipcar; (b) the purpose of the communication; and (c) the means of transmission.

Produce a copy of each communication you identify in response to this question, including copies of any accompanying enclosures or attachments.

3. For each and every vehicle recalled under 17V-408, and for which Ford notified Zipcar (by means including, but not limited to, a specific recall notice), produce a spreadsheet table detailing the following about each vehicle that was in Zipcar's possession, subject to that recall:
  - a. The VIN;
  - b. The date Ford issued a recall notice to Zipcar;
  - c. The means of transmission of the notification referred to in subpart (b) above (e.g., email, U.S. Mail, Ford interactive network, fax, etc.);
  - d. The date Ford transmitted or otherwise made available to Zipcar a VIN list or other information from which to ascertain the vehicle's inclusion in the safety recall;
  - e. The means of transmission for the VIN list or other information from which to ascertain the vehicle's inclusion in the safety recall and recall notice, (e.g., email, mailed letter, Ford interactive network, fax etc.);
  - f. Whether the interim recall remedy was performed on the vehicle. "Interim recall remedy" refers to the inspection and repair procedures Ford instructed its

dealerships to perform under the recall until the permanent recall remedy becomes available;

- g. The date on which the interim recall remedy was performed on the vehicle (if applicable);
- h. Whether the recall remedy was performed on the vehicle. "Recall remedy" refers to the inspection and repair procedures Ford instructed its dealerships to perform under the recall;
- i. The date on which the recall remedy was performed on the vehicle (if applicable);
- j. The name and address of the entity that performed the recall remedy on the vehicle;

Provide your responses in a table in Microsoft Access or Excel entitled "Vehicles Requiring Recall Notice."

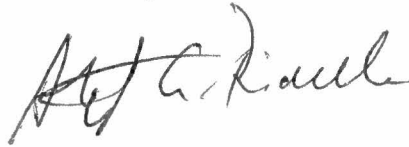
- 4. Produce copies of all documents that evidence, substantiate, or are otherwise related to your responses to each item within the scope of Request No. 3. Organize the documents separately by VIN.
- 5. Provide any additional information Ford considers important for the agency to consider in reviewing and evaluating Ford's responses to any of the requests above. As one example, identify any anomalies in the data or documents and explain the reason(s) for those anomalies.

If Ford claims that any of the information or documents provided in response to this information request constitutes confidential commercial material within the meaning of 5 U.S.C. § 552(b)(4), or is protected from disclosure pursuant to 18 U.S.C. §1905, the company must submit supporting information together with the materials that are the subject of the confidentiality request to the Office of Chief Counsel, W41-326 National Highway Traffic Safety Administration, 1200 New Jersey Ave., SE, Washington, D.C. 20590. Please see 49 CFR Part 512 for further instructions as to what is required to properly file a request for confidential treatment.

Please provide your written response **no later than three weeks from the date of this letter.**

Please direct your response to me and note conspicuously on your response the investigation number assigned to this matter (e.g., AQ17-005). Should you have any questions or concerns, please contact Alex Ansley on my staff at (202) 493-0481 or at [alexander.ansley@dot.gov](mailto:alexander.ansley@dot.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen A. Ridella". The signature is fluid and cursive, with the first name "Stephen" and last name "Ridella" clearly distinguishable.

Stephen A. Ridella, Director  
Office of Defects Investigation  
Enforcement

## Safety Issue Type: Complaints

October 02 2017 NHTSA ID Number: 11031430

Components: UNKNOWN OR OTHER

NHTSA ID Number 11031430

Incident Date July 25 2017

Consumer Location SEATTLE, WA

Vehicle Identification Number 1FTNE1YM0FK\*\*\*\*\*

### Complaint Summary

CRASH No I AM A NHTSA REGION 10 OFFICE EMPLOYEE. I RENTED A 2015 FORD  
FIRE No TRANSIT VAN, LICENSE PLATE #[XXX], FROM ZIPCAR ON 7/25/17 FOR THE  
INJURIES 0 ENTIRE DAY FOR A WORK RELATED EVENT. A FELLOW NHTSA STAFF  
DEATHS 0 PERSON RAN A VIN CHECK ON THE VEHICLE BY PHONE AND DETERMINED  
THERE WAS AN OPEN RECALL ON THE VAN. UNFORTUNATELY, I DID NOT  
WRITE DOWN THE VIN# OF THE SPECIFIC VEHICLE BUT WAS PROVIDED  
ASSISTANCE FROM NHTSA STAFF TO IDENTIFY THE # AS [XXX] (SEE THE  
ATTACHED DOCUMENT PROVIDE TO ME BY NHTSA STAFF PERSON, [XXX]).  
I THEN CONTACTED ZIPCAR AND PUT IN A REQUEST FOR ASSISTANCE,  
SPENDING TIME ON THE PHONE WITH CUSTOMER SERVICE AGENTS,  
FIRST A PERSON APPARENTLY BASED IN MEXICO, THEN ANOTHER BASED  
IN BOSTON. THE LAST PERSON WOULD NOT PROVIDE ME THE NAME OR  
CONTACT INFORMATION FOR ANY "LOCAL FLEET TEAM" MANAGER THAT  
WOULD LIKELY BE RESPONSIBLE FOR REPAIR/MAINTENANCE ON THE  
VEHICLE IN SEATTLE. I DID SPEAK WITH [XXX] (BATCH #[XXX]; HE WOULD  
NOT PROVIDE ME HIS LAST NAME, BUT GAVE ME HIS BATCH #...AN  
EMPLOYEE ID#). I HAVE NOT BEEN CONTACTED BY ANY OTHER ZIPCAR  
REPRESENTATIVES SINCE.

I AM CONCERNED THAT ON THE DATE I RENTED THE VEHICLE THERE  
WERE OPEN, UNMITIGATED RECALLS OF WHICH I WAS NOT MADE AWARE  
BY ZIPCAR.

INFORMATION REDACTED PURSUANT TO THE FREEDOM OF INFORMATION  
ACT (FOIA), 5 U.S.C. 552(B)(6). \*TR

### Affected Products (1)

#### Vehicle

MAKE	MODEL	YEAR
FORD	TRANSIT	2015

**Part 573 Safety Recall Report****17V-408****Manufacturer Name :** Ford Motor Company**Submission Date :** JUN 26, 2017**NHTSA Recall No. :** 17V-408**Manufacturer Recall No. :** 17S15**Manufacturer Information :**

Manufacturer Name : Ford Motor Company

Address : 330 Town Center Drive

Suite 500 Dearborn MI 48126-2738

Company phone : 1-866-436-7332

**Population :**

Number of potentially involved : 372,991

Estimated percentage with defect : NR

**Vehicle Information :**

Vehicle 1 : 2015-2017 Ford Transit

Vehicle Type : LIGHT VEHICLES

Body Style : ALL

Power Train : GAS

**Descriptive Information :** All full size Transit vehicles are affected except 156" and 178" wheelbase Chassis Cab and Cut-Away bodies.

These vehicles are not produced in VIN order. Information as to the applicability of this action to specific vehicles can best be obtained by either calling Ford's toll-free line (1-866-436-7332) or by contacting a local Ford or Lincoln dealer who can obtain specific information regarding the vehicles from the Ford On-line Automotive Service Information System (OASIS) database.

Production Dates : JAN 17, 2015 -JUN 15, 2017

VIN Range 1 : Begin :

NR

End : NR

☐ Not sequential

Vehicle 2 : 2015-2017 Ford Transit

Vehicle Type : LIGHT VEHICLES

Body Style : ALL

Power Train : DIESEL

**Descriptive Information :** All full size Transit vehicles are affected except 156" and 178" wheelbase Chassis Cab and Cut-Away bodies.

These vehicles are not produced in VIN order. Information as to the applicability of this action to specific vehicles can best be obtained by either calling Ford's toll-free line (1-866-436-7332) or by contacting a local Ford or Lincoln dealer who can obtain specific information regarding the vehicles from the Ford On-line Automotive Service Information System (OASIS) database.

Production Dates : JAN 17, 2015 -JUN 15, 2017



VIN Range 1 : Begin :

NR

End : NR

☐ Not sequential**Description of Defect :**

Description of the Defect : The flexible coupling between the transmission and driveshaft in certain 2015-2017 Transit vehicles may prematurely deteriorate and crack with increasing mileage. A cracked flexible coupling will result in an overt moaning noise from underneath the vehicle, along with tactile vibration. Continued driving with a cracked flex coupling may cause separation of the driveshaft, resulting in a loss of motive power while driving, or unintended vehicle movement in park without the parking brake applied. In addition, separation of the driveshaft from the transmission can result in secondary damage to surrounding components, including brake and fuel lines.

Ford is not aware of any reports of accident or injury related to this condition.

FMVSS 1 : NR

FMVSS 2 : NR

Description of the Safety Risk : Continued operation of a vehicle with a cracked flexible coupling may cause separation of the driveshaft, resulting in a loss of motive power while driving, or unintended vehicle movement in park without the parking brake applied. In addition, separation of the driveshaft from the transmission can result in secondary damage to surrounding components, including brake and fuel lines. A driveshaft separation may increase the risk of injury or crash.

Description of the Cause : The driveline angle in these vehicles places the flexible coupling in an operating condition that reduces its long-term durability.

Identification of Any Warning that can Occur : A cracked flexible coupling will result in an overt moaning noise from underneath the vehicle, particularly during coasting operation. Over time, continued driving with a cracked flexible coupling will result in progressively increasing driveline noise and a tactile vibration.

**Supplier Identification :****Component Manufacturer**

Name : Suddeutsche Gelenkscheibenfabrik GmbH &amp;

Address : Graslitzer Strasse 14

Waldkraiburg FOREIGN STATES 84478

Country : Germany

### **Chronology :**

October 2016: An issue concerning reports of cracking and separation of the flexible coupling between the transmission and driveshaft in certain 2015-2017 Transit vehicles was brought to Ford's Critical Concern Review Group (CCRG) for review. Engineering analysis of field returned parts found evidence of gradual flexible coupling deterioration on some vehicles.

November - December 2016: Ford Engineering evaluated 2 vehicles equipped with a field returned flexible couple that had been replaced due to a noise complaint. The vehicles exhibited noticeable noise at speeds above approximately 40 mph. Analysis of reports in Ford's data systems found that approximately 95% of flexible coupling replacements were in response to noise/vibration complaints. Though a few reports of driveline separation were also found, Ford identified no reports of brake function loss.

January - April 2017: Field reports continued to support evidence of overt and progressive indications related to deterioration of the flexible coupling. Field data continued to be monitored.

May 2017: During ongoing monitoring of field reports, Ford received 2 reports alleging flexible coupling-related driveshaft separation that resulted in loss of brake function. Ford inspected 1 of these complaint vehicles in May 2017, and confirmed that flexible coupling-related driveline separation resulted in severed brake lines and contact with fuel lines.

On June 19, 2017, Ford's Field Review Committee reviewed the concern and approved a field action.

**Description of Remedy :****Description of Remedy Program :** Interim Repair:

Based on the field data, Ford does not expect the current flexible couplings to deteriorate sufficiently to result in driveline separation under 30,000 miles.

For affected vehicles with more than 30,000 miles, Ford is finalizing an interim repair. The interim repair will consist of replacing the driveshaft flexible coupling every 30,000 miles until the final repair is available and completed. Owners will be notified by mail and instructed to take their vehicle to a Ford or Lincoln dealer to have the flexible coupling replaced immediately.

For affected sold vehicles with less than 30,000 miles, or affected vehicles that have had a driveshaft or driveshaft flexible coupling replaced within the last 30,000 miles, no alteration or interim repair is required until the vehicle or replaced flexible coupling reaches 30,000 miles. If any customer experiences driveline noise or vibration within the 30,000 mile interval, they will be instructed to contact their dealer.

**Final Repair:**

Owners will be notified when either (a) a redesigned flexible coupling, modified driveshaft bracket and shield, or (b) a revised driveshaft equipped with a universal joint, is available to be installed.

There will be no charge for this service.

Unsold vehicles will be held until the final repair is complete.

Ford provided the general reimbursement plan for the cost of remedies paid for by vehicle owners prior to notification of a safety recall in February 2017. The ending date for reimbursement eligibility is August 31, 2017.

Ford will forward a copy of the notification letters to dealers to the agency when available.

How Remedy Component Differs NR  
from Recalled Component :

Identify How/When Recall Condition NR  
was Corrected in Production :

**Recall Schedule :**

**Description of Recall Schedule :** Notification to dealers is expected to occur on June 27, 2017. Mailing of owner notification letters is expected to begin July 17, 2017 and is expected to be completed by July 21, 2017.

Planned Dealer Notification Date : JUN 27, 2017 - JUN 27, 2017

Planned Owner Notification Date : JUL 17, 2017 - JUL 21, 2017

\* NR - Not Reported